

CHARLES P. DIAMOND (SB # 56881)  
LAW OFFICES OF CHARLES P. DIAMOND  
cdiamond@omm.com  
AMY R. LUCAS (SB # 264034)  
alucas@omm.com  
O'MELVENY & MYERS LLP  
1999 Avenue of the Stars, 8<sup>th</sup> Floor  
Los Angeles, California 90067-6035  
Telephone: +1 310 553 6700  
Facsimile: +1 310 246 6779

RICHARD P LASTING (SB # 53950)  
RICHARD P LASTING LAW OFFICES  
[richardplasting@sbcglobal.net](mailto:richardplasting@sbcglobal.net)  
315 East 8th Street, Suite 801  
Los Angeles, CA 90014  
Telephone: +1 213-489-9025  
Facsimile: +1 310-626-9677

Attorneys for Defendant  
**JUAN SANCHEZ**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
MICHAEL LERMA, et al.,  
Defendants

Case No. 2:18-CR-172-GW

# **NOTICE OF FILING OF JOINT PROPOSED JURY QUESTIONNAIRE (v.10)**

TRIAL DATE: FEB. 25, 2025  
COURTROOM: 10C  
HON. GEORGE H. WU

Defendant Juan Sanchez, on behalf of himself and co-defendants Michael Lerma, Carlos Gonzales and Jose Valencia Gonzales, and the United States of America, hereby submit the parties' Joint Proposed Jury Questionnaire.

Dated: February 13, 2025

28

1 Respectfully submitted,

2 RICHARD P. LASTING  
3 CHARLES P. DIAMOND  
4 AMY R. LUCAS

5 By: /s/ Charles P. Diamond

6 Charles P. Diamond  
7 Attorneys for Defendant Juan Sanchez

8 On Behalf of Defendants Michael Lerma,  
9 Carlos Gonzalez, Jose Valencia Gonzalez  
10 and Juan Sanchez

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**UNITED STATES OF AMERICA**  
**v.**  
**MICHAEL LERMA, CARLOS GONZALEZ, JUAN SANCHEZ, AND JOSE VALENCIA**  
**GONZALEZ**  
**2:18-CR-00172(A)-GW-1,6,7,8**

Thank you to all our prospective jurors!

**JUROR QUESTIONNAIRE** (Revised 2-13-25)

Juror number: \_\_\_\_\_

*Please read these instructions carefully before you fill out the questionnaire.*

This questionnaire is part of the jury selection process and utilized to make the jury selection process shorter and easier. You will be answering these questions under oath as attested to by your signature on the last page. The only purpose of this questionnaire is to determine whether, if selected as a juror, you could fairly and impartially decide this case based solely on the evidence presented at trial and the instructions about the applicable law that will be given by the Court. You should answer with your true feelings, whatever they may be. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important to say so.

Your name that you are asked to provide the next page of this questionnaire, as well as your signature on the last page, will be disclosed only to the Court, Court staff, and the attorneys in the case. It will not be shared with the defendants, witnesses, investigating agents or non-lawyer members of the legal teams. Your responses as set forth in other portions of the completed questionnaire will be anonymous, and those will be shared with the judge, attorneys, parties to the case, and others—but only upon express order of the Court.

Please answer each question as fully as you can. It is extremely important that you answer all the questions yourself, honestly and completely. Do not leave any questions blank. If a question does not apply to you in any way, write “N/A” (for “not applicable”), rather than leaving the question blank. If you do not understand the question, please write that in the space for the answer. If you need more space, please write the question number on the last page and finish your answer. If you feel the answer is too personal, please say so in the space provided. You will have the opportunity to discuss your answer privately. There are no correct answers. The correct answers are truthful answers.

Please do not write on the back of any page. If you need additional space for your answers, use the blank space provided on the last pages of the questionnaire.

You are instructed not to discuss this case or questionnaire with anyone, including your family, fellow jurors, the parties, or the attorneys involved in the case. It is also important that you do not engage in any research such as searching for stories or reports on the internet or social media about this case or anyone or anything to do with it. You must not read or listen to any media accounts whether in a newspaper, on the internet, on television, or on the radio. Do not discuss or post anything about this case on any electronic or social media, including Facebook, YouTube, Twitter, X, Reddit, Instagram, LinkedIn, Snapchat, TikTok, email, text message, any blog, website or chat forum or any other media of any kind.

Upon completion, please make sure you have included your Juror Number on the bottom of this page and the top of next page of the questionnaire. Sign your name on the last page where indicated. Your answers will be given the same effect as a statement given to the Court under oath.

Jury service is one of the most important duties a citizen can be called upon to perform. Thank you for your time and candor.

PLEASE RETURN TO THE JURY ROOM AT 8:30 AM ON TUESDAY, FEBRUARY 25, 2025

## I. Basic information about the case

In this case, the government alleges that the four defendants were part of a Mexican Mafia racketeering enterprise and as part of that enterprise, they committed various crimes in furtherance of the enterprise. One is charged with an assault with a deadly weapon; two are charged with a drug distribution conspiracy; three have been charged with possession of a firearm and ammunition by a prohibited person; one has been charged with using, carrying brandishing, or discharging a firearm in furtherance of a crime of violence; and all four have been charged with a murder committed when they were in custody. All four have pleaded not guilty to all charges and are presumed innocent up and until the time the government proves their guilt beyond a reasonable doubt.

## II. Basic information about you

1. Your full name (first and last)

JUROR # \_\_\_\_\_

JUROR # \_\_\_\_\_

2. Your age

3. What city or town do you live in?

4. How many years have you lived there?

5. Where were you born?

6. Can you do the following fluently in English? Check all that apply.

- Speak
- Write
- Read
- None of the above

7. Can you do the following fluently in Spanish? Check all that apply.

- Speak
- Write
- Read
- None of the above

8. What race do you identify with?

- African American/Black     American Indian/Native Alaskan     Asian  
 Caucasian/White     Native Hawaiian/Pacific Islander     Multi-Racial  
 Hispanic     Other (please specify): \_\_\_\_\_  
 Prefer not to answer

9. Do you have a physical and/or mental disability or impairment that would make it difficult for you to perform jury service?

- No
- Yes, please explain

10. Have you heard about the case?

- No
- Yes, please explain what you have heard and the source of that information:

[Redacted]

If you answered "Yes," have you formed impressions about the case that would make it difficult for you to be a fair and impartial juror, and if so, please explain?

[Redacted]

### **III. Information about your work & education**

11. What is your current employment status? (Please select as many as apply)

- Working full-time
- Working part-time
- Unemployed – looking for work
- Unemployed – not looking for work
- Homemaker
- Full-time student
- Retired
- Disabled

12. What is your occupation? (If not currently employed or retired, please name your most recent prior occupation and length of unemployment.)

[Redacted]

13. What special training or skills do you have?

[Redacted]

14. What is your current occupation or, if not employed, what was your occupation, and how long have you worked at this occupation or how long had you worked for this occupation? Or enter "none" if not applicable.

[Redacted]

15. During the past ten years, what other occupations have you had?

16. Have you ever held a management or supervisory position?

- No  
 Yes, please explain your title, duties and how many people you supervise(d):

17. Do you now, or have you ever, owned your own business?

- No  
 Yes, please explain

18. Please answer the following about your education, or enter 'none' if not applicable

What is the highest level of education you completed?

What college and/or vocational schools have you attended?

What was your major area of study?

19. Have you worked or been involved in the criminal justice system, including as a judge, prosecutor, defense lawyer, probation officer, court or staff member, or have you worked for a federal or state law enforcement or investigative agency?

- No  
 Yes. Please explain and state whether and how that might affect how you view parties in a criminal case:

20. Has anyone you know well worked or gotten involved in the criminal legal system, including as a judge, prosecutor, defense lawyer, probation officer, court or staff member, or has anyone you know well worked for a federal or state law enforcement or investigative agency?

No

Yes. Please explain and state whether and how that might affect how you view parties in a criminal case:

21. Do you or someone you know well have any training or working experience in the following areas:

A. Jail, prison or other correctional facility.

No

Yes, I have       Yes, someone I know well has      If Yes, please explain

B. Forensic Evidence, DNA Analysis, or Accident/Crime Scene Reconstruction.

No

Yes, I have       Yes, someone I know well has      If Yes, please explain

C. Medicine or Health Care.

No

Yes, I have       Yes, someone I know well has      If Yes, please explain

D. Autopsies, Pathology, Medical Examiner, Coroner, or Mortuary Science.

No

Yes, I have       Yes, someone I know well has      If Yes, please explain

E. Cannabinoids.

No

Yes, I have       Yes, someone I know well has      If Yes, please explain

[Redacted]

F. Telecommunications.

- No  
 Yes, I have       Yes, someone I know well has

If Yes, please explain

[Redacted]

G. Legal profession.

- No  
 Yes, I have       Yes, someone I know well has

If Yes, please explain

[Redacted]

22. Which of the following, if any, generally reflects your feelings about science these days? [Check all statements with which you tend to agree.]

- Much scientific data is untrustworthy these days.  
 The seriousness of the COVID-19 pandemic was exaggerated.  
 Forensic information such as DNA evidence is often faked.

If you checked any box, please explain why.

[Redacted]

23. Where do you get your national news?

[Redacted]

24. What are your favorite TV/streaming shows?

[Redacted]

25. What talk radio/podcasts do you listen to?

[Redacted]

26. What social media sites do you follow?

[Redacted]

27. What groups or organizations (e.g. occupational, volunteer, church, community, educational, social, political, professional), if any, do you belong to?

[Redacted]

28. What are your interests or activities outside of work or family?

[Redacted]

#### **IV. Information about your household**

29. What is your marital/relationship status? \_\_\_\_\_

If you are in a relationship, please describe your spouse/partner's occupation, highest level of education, major areas or fields of study, all degrees, certificates, licenses, etc.

[Redacted]

30. Please list the occupation of your spouse, partner, and/or any other adults who live with you. (If you do not live with other adults, please enter "none.")

[Redacted]

31. If you have children, please list their age(s) and occupation if appropriate. (If you do not have children, please enter "none.")

--

32. Do you or any member of your household own a firearm?

No     Yes, I do.     Yes, member of my household

33. Have you or any member of your family suffered from substance or alcohol abuse or drug addiction? If so, identify whether:

No     You     Family member

Whether you answered yes or not, do you have any strong views about those who sell illegal drugs? If so, please explain:

--

#### V. Information about your prior jury service & law enforcement views

34. Have you ever been a juror?

No     Yes    If Yes, please state:

When	Where	Civil or Criminal?	Nature of Case	Reach a Verdict? Yes or No. Do not tell us what it was.

35. If you have served as a jury, did you ever volunteer to be, or were you ever picked as, the foreperson?

No     Yes

36. If you have served on a jury in the past, is there anything about that experience that would influence you in this case or prevent you from rendering a fair and impartial verdict in this case?

No     Yes

If yes, please explain your involvement and whether the experience left you with a negative, positive or neutral impression of law enforcement, judges, prosecutors, defense attorneys, or the criminal justice system:

37. Other than as a juror, have you or has anyone close to you ever been involved in any kind of criminal prosecution, either as a defendant, suspect, or detainee?

- No       Yes

If yes, please explain your involvement and whether the experience left you with a negative, positive or neutral impression of judges, lawyers, or the criminal justice system:

38. Have you or has anyone close to you ever been involved in any kind of civil lawsuit, either as a plaintiff, defendant or witness?

- No       Yes

If yes, please explain your involvement and whether this experience left you with a negative, positive, or neutral impression of lawyers, judges, or our civil legal system?

39. Have you or has anyone close to you ever been the victim of any kind of crime?

- No  
 Yes. If so, please include whether someone was arrested or if there was a trial:

40. Have you or a family member ever filed a report to any law enforcement agency, the United States Attorney's Office, the District Attorney's Office, or the Public Defender's Office? If so, would your experience prevent you from rendering a fair and impartial verdict in this case?

41. Have you or a family member ever been harmed or afraid they might be harmed by becoming a witness in a criminal proceeding?

- No
- Yes. If so, please explain in detail and state whether that experience would prevent you from being a fair and impartial jury in this case:

42. Do you have any strong views about the federal criminal justice systems?

- No
- Yes. If so, please explain:

43. Do you have any strong views about the state criminal justice systems?

- No
- Yes. If so, please explain:

44. Would you tend to treat the testimony of a law enforcement officer differently than a witness not connected with law enforcement?

- No
- Yes. If so, please explain how and why:

45. During the course of the trial, you may hear from witnesses from the following agencies: the Federal Bureau of Investigation (“FBI”), the Pomona Police Department, the Covina Police Department, the Federal Bureau of Prisons (“BOP”), the Los Angeles County Sheriff’s Department, the Santa Ana City Jail, the UC-Irvine Police Department, the Anaheim Police Department, and the Los Angeles County Medical Examiners’ Office, formerly known as the Coroner’s Office. Do you have any opinions about any of these agencies?

46. Which of the following statements best describes your view regarding criminal law in the United States as it relates to people accused of crimes?

- The law provides an appropriate level of protection for people accused of crimes.
- The law does not provide enough protection for people accused of crimes.
- The law provides too much protection for people accused of crimes.

If you believe the law provides too much or not enough protection, please explain.

47. The law provides that a defendant has a constitutional right not to testify and that their decision not to testify cannot be held against them. If a defendant chooses not to testify, would you draw any conclusions from that decision?

- Yes
- Maybe
- No

If Yes or Maybe, please explain:

48. You will be instructed that a criminal defendant is not required to prove he is not guilty at trial; the government has the burden of proving him guilty beyond a reasonable doubt. What are your thoughts about this?

49. The government has the burden of proving a defendant guilty beyond a reasonable doubt of each crime with which he is charged, and no inference of guilt may be drawn from the fact that the defendant faces multiple charges. Are you comfortable following this instruction?

- Yes
- No. If no, please explain:

## VI. Views on certain law enforcement techniques

50. The investigation in this case involved the use of cooperating defendants and cooperating witnesses. Necessarily, some of these witnesses may have engaged in criminal conduct and have

criminal histories. Do you have any general feelings or opinions about the use of these witnesses to investigate and prosecute crimes?

- No
- Yes. If so, please explain:

51. You will hear from certain witnesses who have received, or hope to receive, certain benefits from the government. Do you have any feelings or opinions about these witnesses that would prevent you from following the Court's instructions about how to evaluate their testimony? If yes, please explain:

## VII. Prior experience with gangs/the Mexican Mafia

52. The defendants are charged with racketeering conspiracy on behalf of a criminal organization, namely, the Mexican Mafia. The evidence of criminal activity may include acts involving murder, assault, robbery, extortion, and drug distribution. Is there anything about the nature of the charges that might affect your ability to evaluate the evidence fairly and impartially and render a verdict based on that evidence? If so, please explain:

53. Have you or has anyone you know well had any experience with gangs or gang members, or the Mexican Mafia (La eMe), whether as a member, associate, or victim? If so, please explain, and would your experience prevent you from rendering a fair and impartial verdict in this case?

- No
- Yes, I personally have. Please explain:

Yes, someone I know well has. Please explain:

54. Prior to today, have you heard of the Mexican Mafia or La eMe?

- Yes  
 No

If Yes, what have you heard?

55. If you answered the previous question “yes,” would what you have heard affect you as a juror in this case?

- Yes  
 No

If Yes, please explain:

### VIII. Views on drugs

56. Do you disagree with criminal laws that prohibit the distribution, possession with intent to distribute, or conspiracy to distribute illegal drugs (not including marijuana)? If so, please explain:

57. Would the fact that a testifying witness or defendant used or distributed drugs affect your ability to evaluate the evidence fairly and impartially and render a verdict based on that evidence? If so, please explain:

## **IX. General ability to evaluate the evidence and serve as a juror in this case**

58. Is there any religious, moral, ethical, or other reason why you would be unable to render judgment in this case? If so, please explain.

59. Each of you must decide the case for yourself, but only after you have discussed the evidence with the other jurors, and you have listened to the other jurors. Do you foresee an issue with the deliberation process?

60. In this case you may hear testimony involving weapons, drugs, and violence and see graphic depictions of deceased people. Is there anything about this subject matter that creates a question in your mind as to whether you can be a fair, and impartial juror in this case?

- No
- Yes. Please explain:

## **X. Final questions and juror oath**

61. Please explain if there is anything about the subject matter of this case, or the points covered in this questionnaire, or anything else, which creates a question in your mind as to whether you can be a fair, objective, and impartial juror in this case?

62. Is there anything additional you would like the Judge in this case to know about your service as a juror in this case?

- No
- Yes. Please explain:

63. Did you complete this questionnaire on your own without the assistance of others?

- Yes  
 No

If no, please explain the type of assistance (example: help reading, translation, etc.)

64. This trial is expected to last five weeks beginning on February 25. Generally, trial will be in session Monday through Friday from 8am to 5pm, with morning, lunch, and afternoon breaks. Would it be a hardship for you to serve under those circumstances? If so, please explain in detail.

---

ADDITIONAL SPACE FOR ANSWERS

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---

---





JUROR'S OATH:

I, the undersigned, declare under penalty of perjury that my answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I will not discuss the information with anyone, including on social media, or do any research on the information, names, or any other aspect of the case, including online. I have not discussed my answers with anyone else or received assistance in completing the questionnaire, except as noted above.

Your name:

Your signature:

Juror no.:

Today's date:

---